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2 DECLARATION
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STATE OF WASHIINGTON)
5 ss.
6 COUNTY OF KING)
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AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
DEPUTY

I, Andrew W. Schwarz, declare as follows:

- 1) I am the attorney of record for Plaintiffs Botima and Grace Mongungu under United States District Court Case Number C03-1053.
- 2) This is a simple case. It involves an unjustified arrest without a reasonable suspicion of criminal behavior, which resulted in injury to the plaintiff. Discovery could certainly have been completed by now. Unfortunately, the flow of discovery has been sporadic and contentious.
- 3) In their declarations regarding this and other pending motions, counsel for the defense have made representations that are both malicious and false.
- 4) I have made repeated and continuing attempts to call counsel's attention to discovery failures, beginning in November of 2003. These efforts generally produced no response. (See Declaration of Counsel in Support of Motion to Compel and attached Exhibits, incorporated by reference herein.)
- 5) Once Plaintiff's Motion to Compel was filed, the defense finally produced much of the requested discovery, but not all. On February 17, 2004, the defense produced the long missing signature pages for the individual Officer's responses to Interrogatories and Requests for

Declaration of Counsel
in support of Plaintiff's Reply
Motion to Compel Discovery
C03-1053



03-CV-01053-DECL

ORIGINAL

1
2 Production. That omission was first called to the attention of the defense in a letter dated
3 November 26, 2003. (See letter attached as exhibit 7 to Counsel's Declaration in Support of
4 Plaintiff's Motion to Compel) On February 19, 2004, Defendant City of Seattle finally produced
5 responses to interrogatories that had been due on November 3, 2003.
6

7 6) After reviewing the newly produced discovery, I attempted to engage Ms. Tran in discussions
8 to resolve the pending motions. On 2/27/04, I initiated a lengthy conference. Defense counsel's
9 assertions regarding alleged "agreements" resulting from that conference are greatly overstated.
10

11 7) The only agreement reached was the stipulation regarding the officers' financial records. I
12 proposed that stipulation and dictated the language that was ultimately adopted.
13

14 8) I proposed a number of other possible stipulations by which the discovery issues could be
15 resolved. Defense counsel was willing to discuss the proposals but appeared unwilling or unable
16 to commit to any agreement to resolve the outstanding issues.
17

18 9) I contacted Mr. Larson on Tuesday or Wednesday (March 2nd or 3rd) to find out if the defense
19 was going to agree to any of the proposals raised during the lengthy discussions that occurred in
20 his absence. Mr. Larson did not appear to be willing to agree to anything. Given the looming
21 deadline for responding to the defendants' motion for protective order that was still pending, I
22 had no choice but to terminate the conversation and prepare my response. Despite my best
23 efforts, we had reached no agreement of any kind regarding the outstanding issues other than the
24 one stipulation.
25

26 10) The following Interrogatories and Requests for Production have not been answered or have
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28 Declaration of Counsel
29 in support of Plaintiff's Reply
30 Motion to Compel Discovery
31 C03-1053

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been only partly answered:

A. Interrogatories addressed to City of Seattle (see responses attached and incorporated by reference herein)

3. Has any investigation into this incident been conducted by the internal affairs division of the department or by any other officer or employee of the CITY OF SEATTLE?

If so, please state and describe:

- (a) the nature and substance of the said investigation, including but not limited to the identity of each individual or witness who was interviewed or consulted during said investigation, setting forth the nature and contents of any statement given by said individual, whether any individuals were known to the Department and were not interviewed or refused to be interviewed, whether demands for polygraphs were made, and the outcome of said investigation, including both the decision rendered and any and all disciplinary actions or other consequences that followed as a result therefrom. Were the officers involved demoted, promoted, or was no action taken?
- (b) any reports, memoranda, summaries, photographs, videos, emails, or audiotapes or physical evidence and/or documents produced, generated, or collected during said investigation.

ANSWER: Yes. As a result of the civil Complaint filed by Mr. Mangungu, by his lawyer Andrew Schwarz, an investigation was done by the Internal Investigation Section of the Seattle Police Department. Mr. Mangungu was asked to cooperate, and refused to do so. That investigation was and is internal, for internal purposes only, privileged, confidential, and not subject to disclosure. No demands for polygraphs were made, the matter has not been formally concluded, and there have been no demotions or promotions as a result. In response to Section (b) of Interrogatory No. 3, as well as the following Request for Production, these materials are confidential, privileged, and not subject to production. Nevertheless, without waiving any objection, the City will agree to produce a copy of the file to the Court for *in camera* review, if the court so orders.

REQUEST FOR PRODUCTION:

Please provide any and all reports, memoranda, summaries, photos, emails or any other item referenced in your answer to interrogatory number 3, above.

RESPONSE: Objection: See response to Interrogatory No. 3, above.

Declaration of Counsel
in support of Plaintiff's Reply
Motion to Compel Discovery
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2 5. Was training provided by the CITY OF SEATTLE to individual defendants Sergeant Jandoc,
3 and Officer Conrad, as to (1) making arrests or otherwise seizing criminal suspects; (2)
4 determining whether or not there is probable cause for an arrest or the seizure of a criminal
5 suspect; (3) the use of force and limitations thereon under departmental rules, and state,
federal, and constitutional law?

6 If so, identify and describe:

7 (a) the nature and substance of said training, including the identity of each instructor,
8 lecturer, or teacher who administered said training and the dates of said training;

9 (b) any materials, manuals, guidebooks, course outlines, brochures, regulations, charts,
10 films, audiotapes, or other audiovisual material or teaching aids used in said training.

11 ANSWER: Yes. Seattle Police officers receive training during the state-mandated academy
12 course, and follow-up training with the Seattle Police Department. It is not possible at this date to
13 identify "each instructor, lecturer or teacher," nor to provide copies of the materials requested in
14 subparagraph (b) hereof. Nevertheless, and without waiving any objections, copies of the individual
15 training records for Sergeant Jandoc and Detective Conrad are attached hereto. This illustrates
16 training that each has taken subsequent to becoming a Seattle Police officer (which does not include
17 the Academy, post-Academy, or field training).

18 REQUEST FOR PRODUCTION:

19 Please provide copies of any and all materials, manuals, guidebooks, course outlines or any other
20 materials referenced in your answer to Interrogatory number 5.

21 RESPONSE: See Answer to Interrogatory No. 5, above.

22 7. State whether the CITY OF SEATTLE has referred any instance of police conduct or
23 misconduct to the prosecuting attorney's office for prosecution, or the United States Attorney,
24 or to the FBI, in the last five (5) years.

25 (a) If the answer is yes, state the name and departmental serial number (DSN) of each
26 officer involved in each such incident, and date of each incident so referred.
27 a. the name and address of the insurer;

28 ANSWER: Objection: This interrogatory requests information which is not relevant, not

29 Declaration of Counsel
30 in support of Plaintiff's Reply
31 Motion to Compel Discovery
32 C03-1053

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2 material, not reasonably calculated to lead to the discovery of admissible evidence, an invasion of the
3 individual rights of privacy of involved persons, and is outside the proper scope of Rule 26 as
4 applied to the facts of this case. Without waiving any objection, the Seattle Police Department has
5 made such referrals in the past, none of which involved either of the two individually-named
6 defendants.

7
8 8. Within the five (5) years prior to April 23, 2001, through and including the date of your
9 answer hereto, have the CITY OF SEATTLE, its police department, and/or individual police
10 officers of the CITY OF SEATTLE been the defendants in any lawsuit?

11
12 If yes, as to each lawsuit, state and describe:

13
14 (a) the court and cause number of each such lawsuit;
15 (b) the disposition, whether by trial, dismissal, settlement, or whether the case is still
16 pending.

17
18 ANSWER: Objection: This interrogatory seeks information which is non-material, not
19 relevant, not reasonably calculated to the discovery of admissible evidence, not reasonably within the
20 scope of discovery under Rule 26 as related to the facts of this case, burdensome, and vexatious.
21 Without waiving any objection, The City of Seattle has been named in lawsuits. Plaintiff and/or his
22 attorney can search court dockets as easily as the defendants can, and without incurring unnecessary
23 expenses which the defendants would necessarily have to incur.

24
25 9. Within the five (5) years prior to April 23, 2001, through and including the date of your
26 answer hereto, have the CITY OF SEATTLE or its police department received any citizen
27 complaints against an officer of the department alleging excessive use of force in the making
28 of an arrest, false arrest, and/or malicious or unlawful prosecution?

29
30 If so, please identify and describe:

31
32 (a) the nature, substance, and description of each complaint;
33 (b) the name, address, and telephone number of each complainant.

34
35 ANSWER: Objection: This interrogatory seeks information which is privileged,
36 confidential, not material, not relevant, and not reasonably calculated to lead to the discovery of
37 admissible evidence. This interrogatory also seeks information which may invade the individual
38 rights of privacy of persons involved, and which is not discoverable under state and/or federal law.

39
40 Declaration of Counsel
41 in support of Plaintiff's Reply
42 Motion to Compel Discovery
43 C03-1053

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2 Whether the City of Seattle has ever received any citizen complaints has no bearing on any of the
3 allegations contained in plaintiff's Complaint, nor will it establish any of the elements of plaintiff's
alleged claims against defendants Jandoc or Conrad, or the City of Seattle.

4 12. Please set forth any and all policies/procedures governing background, criminal history, and
5 general pre-employment checks, including any procedures governing psychological
evaluations of candidates for the SEATTLE Police Department.

6
7 ANSWER: Attached are copies of documents currently in use at the present time.

8 REQUEST FOR PRODUCTION:

9 Please provide copies of any written exams, disclosure forms, and pre-employment checks, and
written descriptions of the testing and investigation procedures referenced in your answer to
10 interrogatory number 12 above.

11 RESPONSE: See Answer to Interrogatory No. 12, above.

12 B. Interrogatories addressed to Sergeant Jandoc (see responses attached to Motion to Compel

13 8. Were there in existence at the times of these incidents, internal administrative procedures
14 designed to prevent or correct instances of abuse of the authority of police officers of the Seattle
Police Department? If yes, state:

15 a. the nature of such procedures;
16 b. the person who is responsible for implementing such procedures;
17 c. any charges ever made against you in internal administrative procedure(s), including the
names and addresses of all complainants, the nature of the charges, the identity of the person
administering the disciplinary proceedings, and the outcome.

18
19 ANSWER:

20 a. Internal Investigations. Defendant does not work in IIS and cannot testify to the
21 nature of the procedures of IIS.

22 b. Defendant does not know.
23
24 c. Objection: Defendant objects to this request for production on the grounds that it

25
26 Declaration of Counsel
27 in support of Plaintiff's Reply
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2 is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In
3 addition, plaintiff's seek information that is privileged under RCW 5.60.060(5), RCW 42.17.310
4 and Dawson v. Daly, 120 Wn.2d 782 (1994).
5

6 REQUEST FOR PRODUCTION:
7

8 Please provide copies of any and all materials, manuals, guidebooks, course outlines, or any other
9 materials referenced on your answer to Interrogatory number 8.
10

11 N/A. See answer and objections to interrogatory number 8.
12

13 9. Were either you or your employer insured during the period of time during which this
14 incident occurred against judgments of personal liability based on any abuse of you lawful
15 authority, or were either you or your employer a party to any bonding agreement by which you
16 were held free of liability or by which an insurance company will stand as a guarantor or surety
17 in connection with any state judgment based on any abuse of your lawful authority? If yes, state:
18
19 a. the name and address of the insurer;
20 b. the name and address of the person or persons who pay(s) the premiums;
21 c. the identification number of the policy;
22 d. the effective dates of each policy;
23 e. the policy limits, or amount of any bond;
24 f. the substance of disclaimers of liability contained in the policy.
25

26 ANSWER:
27

28 Objection: Defendant objects to this interrogatory on the ground that it is irrelevant and
29 not reasonably calculated to lead to the discovery of admissible evidence.
30

31 Notwithstanding said objections, defendant answers as follows: No.
32

33 Declaration of Counsel
34 in support of Plaintiff's Reply
35 Motion to Compel Discovery
36 C03-1053

- 1 a. City of Seattle, Claims Department
- 2 b. Unknown
- 3 c. Unknown
- 4 d. Unknown
- 5 e. Unknown
- 6 f. Unknown
- 7
- 8

9 13. Regarding your interaction with the plaintiff, Mr. Botima Mangungu on April 23, 2001,
10 please state:

11 b. the date, substance, and person involved in any conversation or oral report about the incident;
12 c. the identity of any forms or documents created in preparation for or response to the
13 interaction.

14 b. Objection: Defendant objects to this interrogatory on the ground that it is vague and
15 overly broad. Furthermore, defendant objects on the ground that plaintiff appears to be seeking
16 information that is privileged under RCW 5.60.060(5), RCW 42.17.310 and Dawson v. Daly,
17 120 Wn.2d 782 (1994).

18 Notwithstanding said objections, Defendant answers as follows:

19 Please see answer to interrogatory number 12.

20 c. SPD CS #01-188782

21 23. Did the CITY OF SEATTLE or its Police Department ever distribute or require the reading or
22 viewing of any materials (written, computer, video, or audio) concerning: (1) making arrests or
23 otherwise seizing criminal suspects; (2) determining whether or not there is probable cause for an
24 arrest or the seizure of a criminal suspect; (3) the use of force; (4) investigation of a crime scene; (5)
25 police abuse and misconduct; or (6) state or constitutional law?

26 If so, state for each:

27 Declaration of Counsel
in support of Plaintiff's Reply
Motion to Compel Discovery
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2 (a) the title, author, and publication date of each such piece of material and the date when such
3 material was given to the individual defendants to read; (b) whether or not you actually read or
4 viewed each such piece of material, setting forth the date(s) of reading or viewing and (c) whether or
5 not any tests of the materials were given, and if so, what were the results as to the individual officers
6 named as defendants herein?

7 ANSWER:

8 Materials were read during this defendant's training at the Washington State Criminal
9 Justice Training Academy. However, defendant does not presently recall the title, author, and
10 publication date of each such piece of material and the date when such material was given to this
11 defendant to read. Furthermore, this defendant does not presently recall the date(s) of reading or
12 viewing and whether or not defendant was tested on any particular materials, and if so, the results
13 as to this defendant.

14 The City of Seattle Police Department has distributed or allowed the viewing of materials
15 relating generally to (1) making arrests or otherwise seizing criminal suspects; (2) determining
16 whether or not there is probable cause for an arrest or the seizure of a criminal suspect; (3) the
17 use of force; (4) investigation of a crime scene; (5) police abuse and misconduct; or (6) state or
18 constitutional law. However, this defendant does not recall specifically when the materials were
19 distributed or allowed to be viewed, the exact title of the materials, and who authored the
20 materials.

21 REQUEST FOR PRODUCTION:

22 Please provide any and all such materials referenced in your answer to interrogatory number 23.

23
24 Declaration of Counsel
25 in support of Plaintiff's Reply
26 Motion to Compel Discovery
27 C03-1053

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2 ANSWER:

3 See answer to interrogatory number 23. Furthermore, to the extent that plaintiff seeks
4 information that would place a threat to officer safety, or would impede the effective
5 administration of the City of Seattle Police Department, or would impinge on the SPD's right to
6 claim privilege, this defendant objects to the disclosure of such documents under RCW
7 5.60.060(5), RCW 42.17.310 and Dawson v. Daly, 120 Wn.2d 782 (1994).

8
9 1. Have you been the subject of a police department investigation or other investigation or
10 citizen complaint?

11 If so, please identify and describe:

12 (a) the date of each incident or complaint, the identity of the complainant, and the subject
matter of the investigation;
13 (b) the outcome of that investigation, including both the decision rendered and any
disciplinary action or other consequences that followed as a result thereof.

14
15 ANSWER:

16 Objection: Defendant objects to this interrogatory on the grounds that it is overly broad,
17 unduly burdensome, and is not reasonably calculated to lead to the discovery of admissible
18 evidence. In addition, plaintiff seeks information that is privileged under RCW 5.60.060(5),
19 RCW 42.17.310 and Dawson v. Daly, 120 Wn.2d 782 (1994).

20
21 REQUEST FOR PRODUCTION:

22 Please provide any and all such materials referenced in your answer to interrogatory number 24.

23 See objection to interrogatory number 24.

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26 Declaration of Counsel
27 in support of Plaintiff's Reply
Motion to Compel Discovery
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1
2 C. Interrogatories addressed to Detective Conrad (see responses attached to Motion to Compel)

3 6. Were you ever a defendant in any suit, which charged you, individually or in your official
4 capacity as a police officer in the Seattle Police Department, with abuse of your lawful authority?
5 If yes, state for each suit:

6 a. the name and address of each plaintiff;
7 b. the name and address of each defendant;
8 c. the nature of the cause of action;
9 d. the date on which the suit was instituted;
10 e. the court in which the suit was instituted;
11 f. the name and address of the attorney for each party;
12 g. the result of each suit that has been concluded by judgment or settlement.

13 ANSWER:

14 No.

15 8. Were there in existence at the times of these incidents, internal administrative procedures
16 designed to prevent or correct instances of abuse of the authority of police officers of the Seattle
17 Police Department? If yes, state:

18 a. the nature of such procedures;
19 b. the person who is responsible for implementing such procedures;
20 c. any charges ever made against you in internal administrative procedure(s), including the
21 names and addresses of all complainants, the nature of the charges, the identity of the person
22 administering the disciplinary proceedings, and the outcome.

23 ANSWER:

24 a. Internal Investigations. Defendant does not work in IIS and cannot testify to the
25 nature of the procedures of IIS.

26 b. Defendant does not know.

27 c. Objection: Defendant objects to this interrogatory on the grounds that it is vague,
28 irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. In

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addition, plaintiff seeks information that is privileged under RCW 5.60.060(5), RCW 42.17.310 and Dawson v. Daly, 120 Wn.2d 782 (1994).

REQUEST FOR PRODUCTION:

Please provide copies of any and all materials, manuals, guidebooks, course outlines, or any other materials referenced on your answer to Interrogatory number 8.

ANSWER:

None was identified.

9. Were either you or your employer insured during the period of time during which this incident occurred against judgments of personal liability based on any abuse of your lawful authority, or were either you or your employer a party to any bonding agreement by which you were held free of liability or by which an insurance company will stand as a guarantor or surety in connection with any state judgment based on any abuse of your lawful authority? If yes, state:

- a. the name and address of the insurer;
- b. the name and address of the person or persons who pay(s) the premiums;
- c. the identification number of the policy;
- d. the effective dates of each policy;
- e. the policy limits, or amount of any bond;
- f. the substance of disclaimers of liability contained in the policy.

ANSWER:

Objection: Defendant objects to this interrogatory on the ground that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Notwithstanding said objections, defendant answers as follows: No.

- g. City of Seattle, Claims Department
- h. Unknown
- i. Unknown

Declaration of Counsel
in support of Plaintiff's Reply
Motion to Compel Discovery
C03-1053

1
2 j. Unknown

3 k. Unknown

4 l. Unknown

5 13. Regarding your interaction with the plaintiff, Mr. Botima Mangungu on April 23, 2001,
6 please state:

7 b. the date, substance, and person involved in any conversation or oral report about the incident;
8 c. the identity of any forms or documents created in preparation for or response to the
interaction.

9 b. See answer to Interrogatory 12 and Interrogatory 13 a.

10 c. Defendant does not presently recall whether Defendant created documents in
11 preparation or response to the incident involving Mr. Mangungu. However, there are
12 documents relating to the robbery under SPD Case Number 01-188782

13 18. Please, describe any training you received from the Seattle Police Department concerning
14 racial profiling.

15 ANSWER:

16 Defendant attended a general sensitivity training session but this training was not specific
17 to racial profiling.

18 19. Have you ever been a party in a civil suit? If yes, please list the date, county, and reason
19 for the suit.

20 ANSWER:

21 No.

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23 Declaration of Counsel
24 in support of Plaintiff's Reply
25 Motion to Compel Discovery
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27 13

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2 23. Did the CITY OF SEATTLE or its Police Department ever distribute or require the reading or
3 viewing of any materials (written, computer, video, or audio) concerning: (1) making arrests or
4 otherwise seizing criminal suspects; (2) determining whether or not there is probable cause for an
arrest or the seizure of a criminal suspect; (3) the use of force; (4) investigation of a crime scene; (5)
police abuse and misconduct; or (6) state or constitutional law?

5 If so, state for each:

6 (a) the title, author, and publication date of each such piece of material and the date when such
7 material was given to the individual defendants to read; (b) whether or not you actually read or
viewed each such piece of material, setting forth the date(s) of reading or viewing and (c) whether or
8 not any tests of the materials were given, and if so, what were the results as to the individual officers
named as defendants herein?

9
10 ANSWER:

11 Materials were read during this defendant's training at the Washington State Criminal
12 Justice Training Academy. However, defendant does not presently recall the title, author, and
13 publication date of each such piece of material and the date when such material was given to this
14 defendant to read. Furthermore, this defendant does not presently recall the date(s) of reading or
15 viewing and whether or not defendant was tested on any particular materials, and if so, the results
16 as to this defendant.

17 The City of Seattle Police Department has distributed or allowed the viewing of materials
18 generally relating to (1) making arrests or otherwise seizing criminal suspects; (2) determining
19 whether or not there is probable cause for an arrest or the seizure of a criminal suspect; (3) the
20 use of force; (4) investigation of a crime scene; (5) police abuse and misconduct; or (6) state or
21 constitutional law. However, this defendant does not specifically recall when the materials were
22 distributed or allowed to be viewed, the exact title of the materials, and who authored the

23 Declaration of Counsel
24 in support of Plaintiff's Reply
25 Motion to Compel Discovery
26 C03-1053

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2 materials.
3

4 REQUEST FOR PRODUCTION:
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6 Please provide any and all such materials referenced in your answer to interrogatory number 23.
7

8 ANSWER:
9

10 See answer to interrogatory number 23. Furthermore, to the extent that plaintiff seeks
11 information that would place a threat to officer safety, or would impede the effective
12 administration of the City of Seattle Police Department, or would impinge on the SPD's right to
13 claim privilege, this defendant objects under RCW 5.60.060(5), RCW 42.17.310 and Dawson v.
14 Daly, 120 Wn.2d 782 (1994).

15 24. Have you been the subject of a police department investigation or other investigation or citizen
16 complaint?
17

18 If so, please identify and describe:
19

20 (a) the date of each incident or complaint, the identity of the complainant, and the subject matter
21 of the investigation;

22 (b) the outcome of that investigation, including both the decision rendered and any disciplinary
23 action or other consequences that followed as a result thereof.
24

25 ANSWER:
26

27 Objection: Defendant objects to this request for production on the grounds that it is
28 overly broad, unduly burdensome, and is not reasonably calculated to lead to the discovery of
29 admissible evidence. In addition, plaintiff seeks information that is privileged under RCW
30 5.60.060(5), RCW 42.17.310 and Dawson v. Daly, 120 Wn.2d 782 (1994).

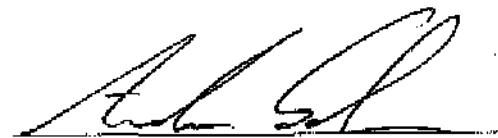
31 Declaration of Counsel
32 in support of Plaintiff's Reply
33 Motion to Compel Discovery
34 C03-1053

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2 REQUEST FOR PRODUCTION:

3 Please provide any and all such materials referenced in your answer to interrogatory number 24.

4
5 I declare under penalty of perjury under the laws of the State of Washington that the foregoing is
6 true and correct to the best of my information and belief.

7
8 3/11/04 See WA
9 Date and place



Andrew W. Schwarz
WSBA #17303

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26 Declaration of Counsel
27 in support of Plaintiff's Reply
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C03-1053

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2 The Honorable Marsha J. Pechman
3

4 UNITED STATES DISTRICT COURT
5 WESTERN DISTRICT OF WASHINGTON
6 AT SEATTLE

RECEIVED

OCT 02 2003

7 BOTIMA MANGUNGU AND GRACE)
8 MANGUNGU, husband and wife,)
9)

STAFFORD FREY COOPER

10 Plaintiffs)
11 v.)
12)

CASE NO. C03-1053P
PLAINTIFF'S FIRST
INTERROGATORIES AND
REQUEST FOR PRODUCTION
OF DOCUMENTS

13 CITY OF SEATTLE, et al.,)
14)
15 Defendants)

16 TO: CITY OF SEATTLE and to STEPHEN P. LARSON and JENNIFER A.
17 TRAN, their Attorneys.

18 Plaintiff, by his counsel, hereby requests that the defendants City of Seattle answer the
19 following interrogatories under oath, separately and fully, within thirty- (30) days of the
20 time of service in accordance with Rules 26 and 33 of the Federal Rules of Civil
21 Procedure. In answering these interrogatories, please furnish all information that is
22 available to you including, but not limited to, information in the possession of your
23 principals, agents, attorney(s) and accountants; not merely information known to the
24 personal knowledge of the person preparing the answers.

25 These requests are deemed to be continuing, and you have the duty to supplement your
26 responses if you obtain further information between the time answers are served and the
27 time of trial.

PLAINTIFF'S FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF
DOCUMENTS

COPY

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ANSWER:

2. Did any named individual defendant or any other Seattle police officer identified in response to Interrogatory No. 1 touch, push, shove, grab, kick, strike, or otherwise come into contact with the person of Plaintiff during the incident?

If so, please state:

(a) who had contact with Plaintiff; and

(b) what parts of Plaintiff's body were contacted and the total number of times he was contacted in each body part by each person identified in response to subpart (a).

(c) please describe the manner of contact for each item above.

ANSWER:

3. Has any investigation into this incident been conducted by the internal affairs division of the department or by any other officer or employee of the CITY OF SEATTLE?

If so, please state and describe:

(a) the nature and substance of the said investigation, including but not limited to the identity of each individual or witness who was interviewed or consulted during said investigation, setting forth the nature and contents of any statement given by said individual, whether any individuals were known to the Department and were not interviewed or refused to be interviewed, whether demands for polygraphs were made, and the outcome of said investigation, including both the decision rendered and any and all disciplinary actions or other consequences that followed as a result therefrom. Were the officers involved demoted, promoted, or was no action taken?

(b) any reports, memoranda, summaries, photographs, videos, emails, or audiotapes or physical evidence and/or documents produced, generated, or collected during said investigation.

ANSWER:

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4 REQUEST FOR PRODUCTION:

5 Please provide any and all reports, memoranda, summaries, photos, emails or any other
6 item referenced in your answer to interrogatory number 3, above.

7
8 4. Do you contend that the force used by individual defendants Sergeant Jandoc, Officer
9 Conrad, and/or any other Seattle police officer against Plaintiff was reasonable and/or
10 necessary under the circumstances?

11 If so, state or describe:

12 (a) all facts and witnesses that support the use of force by said Defendant(s);
13 (b) each Seattle Police Department policy or procedure that authorized such use of
14 force.

15
16 ANSWER:

17 REQUEST FOR PRODUCTION:

18 Please provide copies of any and all reports, memoranda, policies, or procedures
19 referenced in your answer to Interrogatory number 4, above.

20
21 5. Was training provided by the CITY OF SEATTLE to individual defendants Sergeant
22 Jandoc, and Officer Conrad, as to (1) making arrests or otherwise seizing criminal
23 suspects; (2) determining whether or not there is probable cause for an arrest or the
24 seizure of a criminal suspect; (3) the use of force and limitations thereon under
25 departmental rules, and state, federal, and constitutional law?

26 If so, identify and describe:

27 (a) the nature and substance of said training, including the identity of each instructor,
lecturer, or teacher who administered said training and the dates of said training;
(b) any materials, manuals, guidebooks, course outlines, brochures, regulations,
charts, films, audiotapes, or other audiovisual material or teaching aids used in said
training.

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2 ANSWER:
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6 REQUEST FOR PRODUCTION:
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8 Please provide copies of any and all materials, manuals, guidebooks, course outlines or
9 any other materials referenced in your answer to Interrogatory number 5.
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12 6. Identify the chain of command for the CITY OF SEATTLE Police Department in
13 effect at the time of the incident, describing in succession the immediate superior or
14 supervisors for individual defendants Sergeant Jandoc and Officer Conrad, and
15 throughout the ranks to the ultimate final authority or commander, identifying all
16 individuals in the chain and the rank and title of each.
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19 ANSWER:
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22 7. State whether the CITY OF SEATTLE has referred any instance of police conduct or
23 misconduct to the prosecuting attorney's office for prosecution, or the United States
24 Attorney, or to the FBI, in the last five (5) years.
25

26 (a) If the answer is yes, state the name and departmental serial number (DSN) of each
27 officer involved in each such incident, and date of each incident so referred.
28

29 a. the name and address of the insurer;
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32 ANSWER:
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2 8. Within the five (5) years prior to April 23, 2001, through and including the date of
3 your answer hereto, have the CITY OF SEATTLE, its police department, and/or individual
4 police officers of the CITY OF SEATTLE been the defendants in any lawsuit?

5 If yes, as to each lawsuit, state and describe:
6 (a) the court and cause number of each such lawsuit;
7 (b) the disposition, whether by trial, dismissal, settlement, or whether the case is still
8 pending.

9 ANSWER:

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15 9. Within the five (5) years prior to April 23, 2001, through and including the date of
16 your answer hereto, have the CITY OF SEATTLE or its police department received any
17 citizen complaints against an officer of the department alleging excessive use of force in
18 the making of an arrest, false arrest, and/or malicious or unlawful prosecution?

19 If so, please identify and describe:
20 (a) the nature, substance, and description of each complaint;
21 (b) the name, address, and telephone number of each complainant.

22 ANSWER:

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27 10. Identify (setting forth the name, title, and position, as well as other identifying
information) each person whom you or your attorney expects to call as an expert witness
at the trial of this matter.

1
2 (a) State the general nature of the subject matter on which each expert is expected to
3 testify;
4 (b) State the substance and nature of the facts and opinions to which each expert it
5 expected to testify and a summary of the grounds for each opinion.

6 ANSWER:

7
8
9 REQUEST FOR PRODUCTION:

10
11 Please provide any and all reports, correspondence, whether written or electronic,
12 curriculum vitae, qualifications, and statements regarding each expert witness identified
13 in your answer to Interrogatory number 10.

14
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16 11. At the time of the incident alleged in Plaintiff's complaint, was there in effect one or
17 more insurance agreements or any insurance pool or self insurance program or pool that
18 may be liable to satisfy part or all of a judgment that may be entered in this action or to
19 indemnify or reimburse payments made to satisfy a judgment?

20
21 If so, please set forth:

22 (a) a description of each such policy, including the name and address of the company
23 issuing each such policy, the policy number of each such policy, the effective dates of the
24 policy, the exact identity of each named insured as set forth on each such policy, the
limits of bodily injury and liability coverage of each policy, and the substance of any
disclaimer of liability contained in each such policy.

25
26 ANSWER:

1
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3 REQUEST FOR PRODUCTION:

4 Please provide the policy with riders that is referenced in your answer to interrogatory
5 number 11 above or a description of any insurance pool or self-insurance program that is
6 reference above with a statement indicating the scope of coverage and limits of liability.

7
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9
10 12. Please set forth any and all policies/procedures governing background, criminal
11 history, and general pre-employment checks, including any procedures governing
12 psychological evaluations of candidates for the SEATTLE Police Department.

13
14 ANSWER:

15 REQUEST FOR PRODUCTION:

16 Please provide copies of any written exams, disclosure forms, and pre-employment
17 checks, and written descriptions of the testing and investigation procedures referenced in
18 your answer to interrogatory number 12 above.

19
20 13. Please set forth what documents, records, and memoranda relating to the
21 background, criminal history, and general pre-employment checks of individual
22 defendants Sergeant Jandoc and Officer Conrad are in the possession of the Seattle Police
23 Department.

24 ANSWER:

25 REQUEST FOR PRODUCTION:

26 Please provide any and all materials referenced in your answer to interrogatory number
27 13 above.

INTERROGATORIES AND REQUEST FOR PRODUCTION submitted this

30 day of Sept, 2003.


Andrew W. Schwarz, WSBA #17303
Attorney for Plaintiffs

INTERROGATORIES AND REQUEST FOR PRODUCTION submitted this
____ day of _____, 2003.

Stephen P. Larson
WSBA #4959
Attorney for Defendants

Jennifer A. Tran
WSBA #28756
Attorney for Defendants

DECLARATION OF DEFENDANT

THE CITY OF SEATTLE states and declares under penalty of perjury under the law of the United States and the State of Washington that he is one of the defendants herein; that he has read the above and foregoing Interrogatories and Requests for Production, knows the contents thereof, and believes the same to be true and correct.

Dated this _____ day of _____, 2003.

1
2 Certificate of Service
3

4 The undersigned certifies under the penalty of perjury according to the laws of the
5 United States and the State of Washington that on this date I caused to be served in the
6 manner noted below a copy of this document entitled PLAINTIFF'S FIRST SET OF
7 INTERROGATORIES AND REQUESTS FOR PRODUCTION on the following
8 individual:
9

10
11 Jennifer A. Tran, Esq.
12 Stafford Frey Cooper, P.C.
13 3100 Two Union Square
14 601 Union Street
15 Seattle, WA 98101

16
17 *Attorney for Defendants*
18

19 [X] Via Messenger
20 [] Via Facsimile
21 [] Via First Class Mail
22

23 DATED this 30th day of September, 2003, at Seattle, Washington.
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27 Willie Williams
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